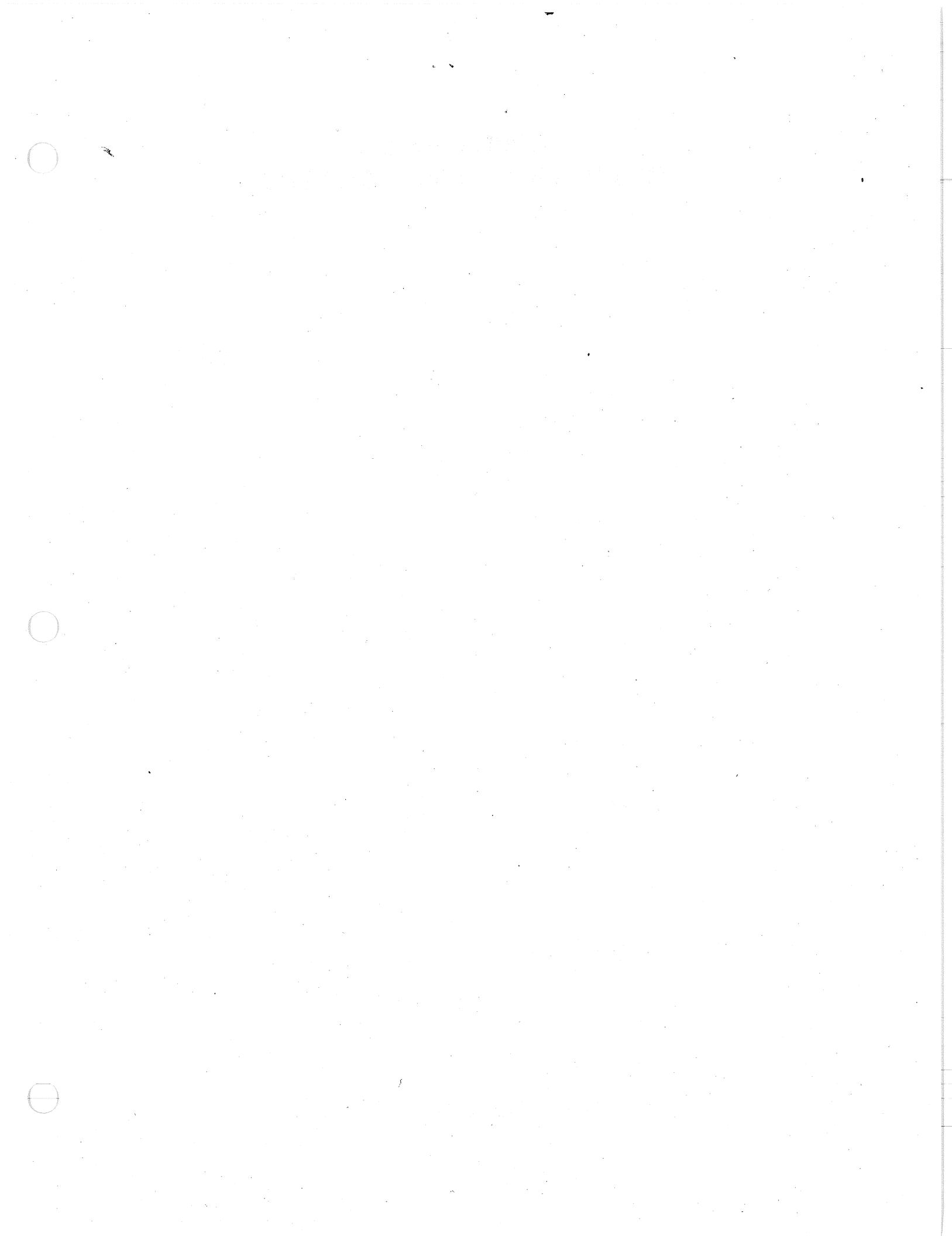


## **APPENDIX D**

### **RESPONSIVENESS SUMMARY**



## **APPENDIX D - RESPONSIVENESS SUMMARY**

During the public comment period of March 27, 2003 until April 30, 2003, three comments were submitted. One oral comment was submitted during the March 27 public meeting, one oral comment was received via telephone at (317) 234-0357, and one written comment was submitted. Following is a summary of the comments and responses to each.

1. The groundwater monitoring has not collected data enough to establish trend lines to project future contamination. Commentor would like to see more data on groundwater.

**Response:**

Additional data is desirable and will be collected. Thirty-one additional wells and piezometers were installed in the shallow aquifer and 44 additional wells were installed in the intermediate and deep aquifers during the pre-design investigation in 2001. Samples were collected from the new wells. An additional round of residential well samples was also collected in December 2002. The data that was collected will be compiled and presented in the remedial design plans for the groundwater. The remedial action for site wide groundwater will include a comprehensive monitoring program that will provide the data necessary to improve the establishment of trend lines and project movement of contamination, as well as any changes in the nature or concentration of the contaminants of concern.

2. Request that IDEM/EPA consider amending the Record of Decision to include the option of transporting hazardous material to an existing facility.
  - a) The cost of building a hazardous material landfill in Kokomo does not include the cost to place sludge in a temporary liner, handling runoff and returning the material to the landfill;
  - b) There are three approved landfills within economic trucking distance;
  - c) The advantage of receiving bids or RFPs (Requests for Proposal ) to ship the material to an existing landfill would be that the cleanup could be completed in phases as money becomes available. It would benefit the State of Indiana and the City of Kokomo by placing certain areas of the site back into productive use by the community.

**Response:**

- (a) The cost estimate for building the Corrective Action Management Unit (CAMU) in the Final Remedial Design does include the cost to place soil and sludge from the Acid Lagoon Area in a temporary liner, handle runoff and return the material to the landfill, along with other associated costs.
- (b) The lowest offsite disposal cost that was submitted to EPA during the

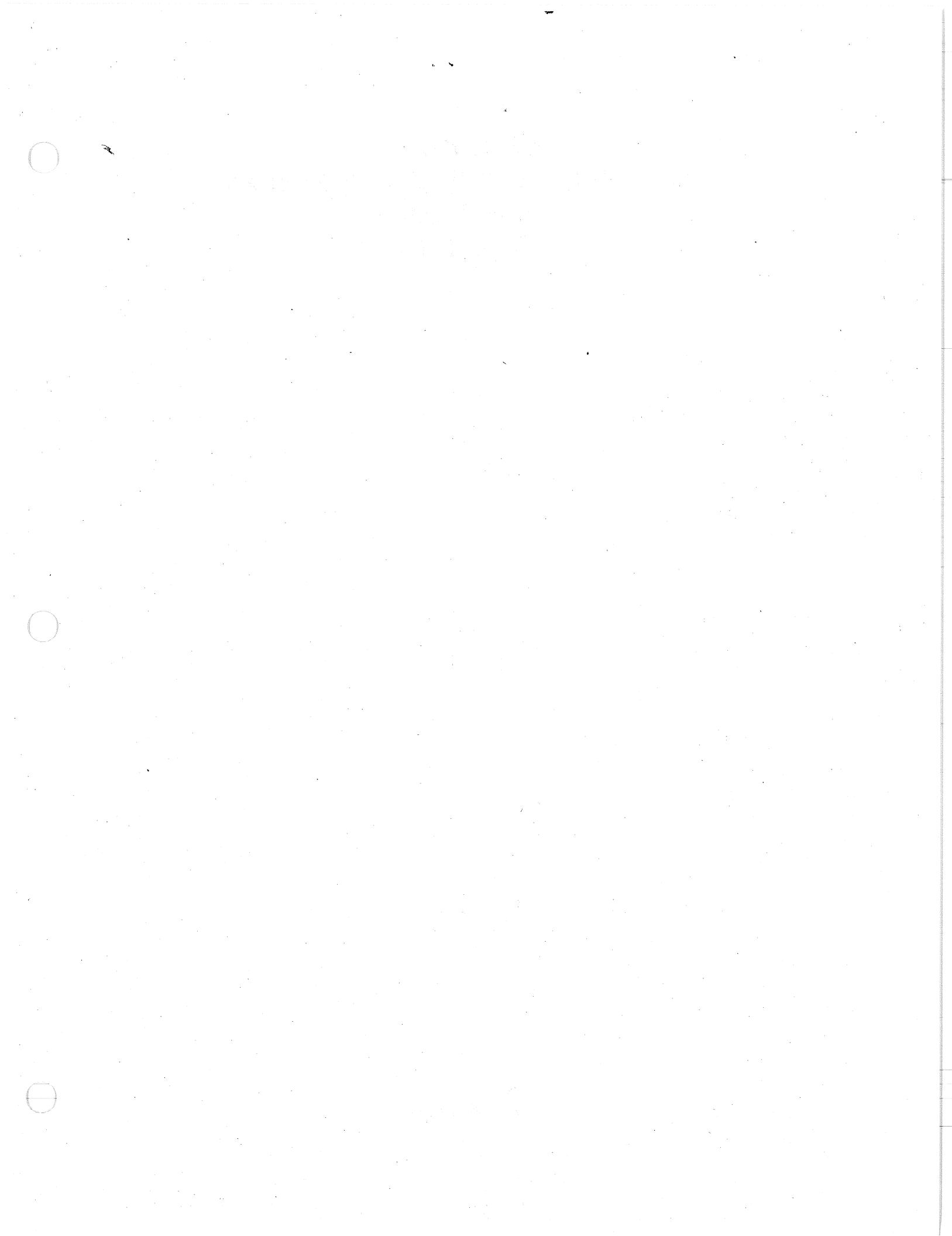
remedial design was from the nearest landfill. That facility submitted a price of \$24 per ton plus a cost for transportation that was subject to change. The total cost of soil, sediment and sludge must be considered when determining if any alternative is cost effective. Approximately 11,000 cubic yards of sediment are expected to be over 50 parts per million and would necessarily go to a facility that can accept TSCA waste. IDEM and EPA must also consider the funds already invested in remedial design plans, and the cost of new designs to accommodate off-site disposal. IDEM performed an informal telephone survey of disposal costs for the three nearest landfills. The resultant information indicated that a reduced disposal cost may be available if the material can be used as Alternative Daily Cover. This may be possible, but would require an Insignificant or Minor Modification of the landfill's permit. IDEM has not determined that the reduction in cost would be sufficient to support a change in the selected remedy from on-site disposal to off-site disposal. IDEM is investigating this information further.

- (c) Any bids submitted at this time may expire before the remedy can be implemented, however as stated above IDEM is investigating cost information further. On June 5, 2003, letters were issued in July 2003 to three nearby landfills requesting rate information based on the possibility of using soil and sludge as alternate daily cover, however none of the three facilities responded. The U.S. Environmental Protection Agency (EPA) considers the full cost of a remedy when making funding decisions. The decision to start a new remedial action is considered a commitment to complete that remedy, therefore, EPA endeavors to ensure that it can set aside the entire cost. Experience has shown that completing a remedy in phases can raise the cost. When implementation of a remedy is interrupted, cost increases are incurred associated with start-up and close-out of each phase of the project. The current management approach was designed to group similar activities. It was developed to achieve economies of scale, thereby reducing the overall construction costs and minimizing recurrent start-up and close-out costs.

3. I support the proposed plan, and the more protective cleanup levels.

Response:

Thank you for your comment.



**APPENDIX E**  
**ADMINISTRATIVE RECORD INDEX**  
**March 2003**  
**Update #6**

**ADMINISTRATIVE RECORD INDEX**  
**CONTINENTAL STEEL SUPERFUND CLEANUP SITE**  
**KOKOMO, HOWARD COUNTY, INDIANA**

**MARCH 2003**

**UPDATE #6**

NUMBER OF PAGES	DATE	TITLE/DESCRIPTION	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCUMENT NUMBER
4	4/3/01	Fourth Amendment to the Contract for Services between IDEM and IT Corporation – ARN# 98-138-A4	Suzanne Esserman, IDEM	Peter Bauscher, IT Corporation	Correspondence	1
24	4/20/01	Amendment to the Supplement to the Master Agreement – ARN# 96-843-18-A1	Suzanne Esserman, IDEM	Mark Burgess, Camp Dresser & McKee	Correspondence	2
4	4/25/01	Fourth Amendment to the Contract for Services between IDEM and IT Corporation – ARN# 98-138-A4	Suzanne Esserman, IDEM	Peter Bauscher, IT Corporation	Correspondence	3
15	11/21/01	Superfund State Contract for Operable Unit 6 – Slag Processing Area	Suzanne Esserman, IDEM	Gloria Willis, USEPA	Correspondence	4
1	1/10/02	Remedial Action Funding Projections	Pat Likins, IDEM	Congressman Steve Buyer	Correspondence	5
3	8/2/02	Response letter regarding Continental Steel Superfund Site	Marianne Lamont Horinko, USEPA	Governor Frank O'Bannon	Correspondence	6
3	8/9/02	Response letter regarding Continental Steel Superfund Site	Christine Tood Whitman, USEPA	Congressman Steve Buyer	Correspondence	7
3	9/11/02	Corrective Action Management Unit	Pat Likins, IDEM	Representative Ron Herrell	Correspondence	8

4	3/21/01	Letter of comments regarding Draft Work Plan - Remedial Design	Pat Likins, IDEM	Matt Mankowski, USEPA	Plans/Studies/ Reports	22
6	3/30/01	Letter of response to comments regarding Remedial Design Work Plan - WA No. 122-RDRD-05BW, Contract No. 68-W6-0025	Daniel Plomb, CH2M Hill	Matt Mankowski, USEPA	Plans/Studies/ Reports	23
1	3/31/01	Map - Figure 3 - Boundary Survey - Continental Steel Superfund Site	IT Corporation	DEM	Plans/Studies/ Reports	24
56	4/20/01	Work Plan - Final - Remedial Design	CH2M Hill	USEPA	Plans/Studies/ Report	25
1	4/3/01	Map - Figure 2 - Survey of Below Grade Structures, Main Plan Area, Continental Steel Superfund Site	IT Corporation	DEM	Plans/Studies/ Reports	26
6	4/6/01	Letter with Revised Pages for the Remedial Design Work Plan	Daniel Plomb, CH2M Hill	Matt Mankowski, USEPA	Plans/Studies/ Reports	27
2	4/16/01	Letter submitting the Final Ground Control Coordinates	Richard Easler, IT Corporation	Mark Burgess, Camp Dresser & McKee	Plans/Studies/ Reports	28
3	4/16/01	Letter submitting comments on the March 2001, "Draft Site Management Plan"	Pat Likins, IDEM	Matt Mankowski, USEPA	Plans/Studies/ Reports	29
1	4/18/01	Property Boundary Survey, Revision 2 and Last Submittal Prior to Final Application for Payment	Pat Likins, IDEM	Mark Burgess, Camp Dresser & McKee	Plans/Studies/ Reports	30
4	4/26/01	Site Decontamination and Demolition Comments to Figure 1 and Figure 2	Aimee Vessell, Camp Dresser & McKee	Richard Easler, IT Corporation	Plans/Studies/ Reports	31
3	4/27/01	Survey of Below Grade Structures - Comments	Pat Likins, IDEM	Mark Burgess, Camp Dresser & McKee	Plans/Studies/ Reports	32

7	7/9/01	Letter regarding Remediation Area – Howard County – Wildcat Creek	James Hebenstreit, IDNR, Division of Water	Pat Likins, IDEM	Plans/Studies/ Reports	43
41	7/13/01	Basis of Design – Slag Processing Area Final Design – Basis of Design Report and Draft (Rev. 1) Request for Bid	CH2M Hill	Matt Mankowski, USEPA	Plans/Studies/ Reports	44
4	7/20/01	Survey of Below Grade Structures Drawing, Revision No. 2	Pat Likins, IDEM	Mark Burgess, Camp Dresser & McKee	Plans/Studies/ Reports	45
8	8/3/01	Letter submitting the QAPP Addendum	Paul Arps, CH2M Hill	Matt Mankowski, USEPA	Plans/Studies/ Reports	46
18	9/20/01	Howard County Law Enforcement proposal for Continental Steel Slag Processing Area Site	Michael Welker, Dept\uty, Howard County Sheriff's Department		Plans/Studies/ Reports	47
7	9/24/01	Letter regarding Preliminary Design Comments – Acid Lagoon Area – “Design Criteria Report” August 2001	Pat Likins, IDEM	Matt Mankowski, USEPA	Plans/Studies/ Reports	48
12	9/28/01	Final Monthly Progress Report No. 20 – Main Plant Decontamination and Demolition – Project Closeout Activities – Report Period – January – September 2001	Mark Burgess, Camp Dresser & McKee	Pat Likins, IDEM	Plans/Studies/ Reports	49
221	1/2002	Revised Design Criteria Report – Remedial Design	CH2M Hill	USEPA	Plans/Studies/ Reports	50
9	1/7/02	Letter regarding Revised Design Criteria Report, WA No. 122-RDRD-05BW, Contract No. 68-W6-0025	Daniel Plomb, CH2M Hill	Matt Mankowski, USEPA	Plans/Studies/ Reports	51

3	5/15/02	Request for review, Lagoon Area – Basis of Design Continental Steel Superfund Site	Mary Beth Tuohy, IDEM	Michael Neyer, Division of Water, IDNR	Plans/Studies/ Reports	61
5	6/12/02	Letter regarding 95% Design Comments – Acid Lagoon Area – April 2002 Documents	Pat Likins, IDEM	Fred Bartman, USEPA	Plans/Studies/ Reports	62
476	7/2002	Main Plant Area (OU5) Design Criteria Report – Remedial Design – Backfill and Capping/Covers	CH2M Hill	USEPA	Plans/Studies/ Reports	63
4	8/20/02	Letter of comments regarding Preliminary Plant Area (OU5) – Design Criteria Report – Backfill and Capping/Covers	Pat Likins, IDEM	Fred Bartman, USEPA	Plans/Studies/ Reports	64
109	8/21/02	Letter regarding the completed and approved of the Five-Year Review Report with the First Five-Year Review Report – dated July 2002	Pat Likins, IDEM	Fred Bartman, USEPA	Plans/Studies/ Reports	65
32	8/2002	Lagoon Area (OU2) Draft Operations & Maintenance Manual	CH2M Hill	USEPA	Plans/Studies/ Reports	66
347	9/2002	Final – Lagoon Area – Basis of Design – Remedial Design	CH2M Hill	USEPA	Plans/Studies/ Reports	67
507	9/2002	Lagoon Area (OU2) – Solids Excavation and Consolidation with Attachments	CH2M Hill	USEPA	Plans/Studies/ Reports	68
12	9/9/02	Comparison of Costs and Conditions Under Previous Use, 1997 CAMU Design, and 2002 CAMU Design Scenarios – Continental Steel Acid Lagoon Area			Plans/Studies/ Reports	69

170	12/2002	Continental Steel Superfund Site Reuse Analysis	Strand Associates, Inc.	City of Kokomo	Community Relations	77
2	3/1/98	"Continental Cleanup – Input sought from community" Newspaper Article	<i>Kokomo Tribune</i>	General Public Relations	Community Relations	78
1	3/6/98	"Public speaks out on cleanup" Newspaper Article	Newspaper Article	General Public Relations	Community Relations	79
1	5/13/99	"Continental media day set" Newspaper Article	<i>Kokomo Tribune</i>	General Public Relations	Community Relations	80
4	6/17/99	Public Meeting Agenda – Continental Steel Decontamination and Demolition Project with attendees list	DEM	General Public Relations	Community Relations	81
6	6/19/99	DEM Fact Sheet – Decontamination and Demolition, Main Plant	DEM	General Public Relations	Community Relations	82
6	6/23/99	Invitation to a "Public Availability Session" regarding Continental Steel Supervened Site Main Plant Decontamination and Demolition Project with attendees list	DEM	General Public Relations	Community Relations	83
2	10/8/99	EPA, IDEM Provide Additional funds for Continental Steel News Release	DEM Immediate News Release	General Public Relations	Community Relations	84
3	6/21/00	"DEM to Demolish Main Building at Continental Steel Site" and Notice of Public Meeting on June 24, 2000	DEM Immediate News Release	General Public Relations	Community Relations	85
17	2/26/01	Letter regarding Draft Proposed Plan for Amendment – Interim Record of Decision with Draft Fact Sheet	Pat Likins, IDEM USEPA	Matt Mankowski, USEPA	Community Relations	86
1	11/14/01	Copy of Public Notice published in the Newspaper			Community Relations	87

10	6/13/02	Fact Sheet – First Five-Year Review Report	DEM	General Public	Community Relations	97
3	6/19/02	Affidavit regarding publication for IDEM in the Kokomo Tribune – public meeting	Debbie Branch and Linda Lechner, Kokomo Tribune	DEM	Community Relations	98
12	9/9/02	Continental Steel – Acid Lagoon Area – Comparison of Costs and Conditions under Previous USE, 1997 CAMU Design, and 2002 CAMU Design Scenarios	DEM	DEM	Community Relations	99